

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FRANCO RIBEIRO and DEANNA
RIBEIRO, as individuals and as next
friends and biological parents of
LUCAS RIBEIRO, an infant,

Plaintiffs,

vs.

BABY TREND, INC., et al.,

Defendants.

CASE NO. 8:12cv204

**MOTION TO RESTRICT ACCESS TO
UNREDACTED DOCUMENTS**

COMES NOW Plaintiffs Franco Ribeiro and Deanna Ribeiro ("Plaintiffs"), pursuant to NECivR 5.0.3(c) and the E-Government Act of 2002, Pub. L. No. 107-347, 116 Stat. 2899 (Dec. 17, 2002), hereby move the Court for an Order restricting access to (1) Plaintiff's Brief in Opposition to Lerado's Motions to Dismiss ("Brief") (Filing No. 365) and (2) Index of Evidence in Support of Plaintiff's Brief in Opposition to Lerado's Motions to Dismiss ("Index") (Filing No. 366). Restriction is appropriate as certain information contained within the Brief and Index is subject to a Stipulated Protective Order which was entered in the above-captioned lawsuit. (Filing No. 333).

WHEREFORE, Plaintiffs respectfully request an Order restricting public access to the Brief and Index.

Dated this 4th day of March, 2016.

FRANCO RIBEIRO and DEANNA RIBEIRO,
as individuals and biological parents and next
friends of LUCAS RIBEIRO, an infant,
Plaintiffs,

By: /s/ Emily J. Wischnowski
Michael F. Coyle #18299
Ryan M. Sewell #22476
Emily J. Wischnowski #25101
FRASER STRYKER PC LLO
500 Energy Plaza
409 South 17th Street
Omaha, NE 68102
402-341-6000
and
Greg Garland #16248
GARLAND LAW PC
Linden Place, Suite 100
14301 FNB Parkway
Omaha, NE 68154
(402) 330-7000

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically with the United States District Court for the District of Nebraska on March 4, 2016, using the CM/ECF system which sent notification of such filing to the following:

John W. Patton, Jr.
Michael G. Vranicar
Natalie J. Eschbach
Patton & Ryan, LLC
330 N. Wabash, Suite 3800
Chicago, IL 60611

***Counsel for Baby Trend; Mark Sedleck;
and Millenium Development***

Michael F. Kinney
David A. Blagg
Ronald F. Krause
Cassem, Tierney, Adams, Gotch
& Douglas
9290 W. Dodge Road, Suite 302
Omaha, NE 68114

Counsel for Indiana Mills

Matthew R. King
Randall R. Riggs
Frost Brown Todd, LLC
P.O. Box 44961
Indianapolis, IN 46244

Counsel for Indiana Mills

John C. Gray
Jessica A. Uhlenkamp
Heidman Law Firm, LLP
128 Historic Fourth Street
P.O. Box 3086
Sioux City, IA 51102-3086

***Counsel for Lerado Group Co., Ltd.;
Lerado Group (Holding) Company;
Lerado (Zhong Shan) Industrial Co.,
Ltd.; Lerado China Limited; and Lerado
H.K. Limited:***

Stephen G. Olson, II
Elizabeth B. Smith
Kristina J. Kamler
Engles, Ketcham, Olson & Keith, P.C.
1350 Woodmen Tower
1700 Farnam Street
Omaha, NE 68102

***Counsel for Gnotec Reftele AB; AB
Gnosjogruppen AB and Holmbergs
Safety System Holding AB***

/s/ Emily J. Wischnowski